

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

JEREMY CLARK et al.,

Plaintiff,

v.

Case No. 17CV393

HEATHER HEINEN,

Defendant.

DEFENDANT'S RULE 26(A)(3)(A) AND (B) DISCLOSURES

Defendant Heather Heinen, by and through her undersigned attorneys,
submits her Rule 26(a)(3)(A) and (B) Disclosures.

Names of Witnesses Defendants Will Call:

1. Defendant Heather Heinen
2. Trevor Klemmer
3. Keith Immerfall

Names of Witnesses Defendant May Call:

1. Dr. Kristina DeBlanc
2. Andrew Larson
3. James Olson
4. Donna Larson

5. Any witness identified on Plaintiff's witness list, regardless of whether Plaintiff actually calls that witness at trial.

The above-listed witnesses may be contacted through defense counsel.

Based upon the presentation of Plaintiff's case, Defendants reserve the right to call rebuttal witnesses.

EXHIBITS

The Defendants' exhibit list will be filed as a separate document on today's date.

Dated this 23rd day of August, 2019.

Respectfully submitted,

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s/Katherine C. Polich
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